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**RESPONSES TO THE OEPA COMMENTS ON THE
PROJECT SPECIFIC PLAN FOR WAC ATTAINMENT SAMPLING
OF STOCKPILES 1, 2, AND 4**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 2.1

Pg #:

Line #:

Code: General

Original Comment #: 1

Comment: This Plan specifies that ten samples will be taken from each of the stockpiles. Considering the high degree of heterogeneity and the lack of process knowledge of the excavated areas, this number is low.

Consider the West Stockpile. The expected heterogeneity is low based on the assumed contamination mechanism of airborne deposition. Sixty random samples and 28 biased samples were deemed necessary to adequately demonstrate WAC attainment.

Consider the East Stockpile. Same expectations of homogeneity, same deposition mechanism but 24 samples were used to demonstrate WAC attainment.

Consider SP-5. This stockpile is more similar to the three piles being considered in this Plan. The pile is expected to be highly heterogeneous because soils from a variety of locations were composited into one pile.

Response: DOE agrees that SP-1, SP-2, and SP-4 are expected to have a high degree of heterogeneity and are similar to SP-5. Based on the total volumes of SP-1, SP-2, and SP-4 (including debris) and assuming ten initial random samples for each stockpile, the sample density will be one sample per 201 cubic yards for SP-1, one sample per 233 cubic yards for SP-2, and one sample per 259 cubic yards for SP-4. In addition to the random sampling, biased samples may be identified through a real-time surface scan of each stockpile and a beta/gamma scan of the entire length of each boring as explained in Sections 2.3.3 and 3.4 of the project-specific plan (PSP).

The sample density of SP-5 was one sample per 350 cubic yards when only the planned random sample locations are considered (54 random samples in an 18,700 cubic yard stockpile). When all random samples and biased samples that were actually collected are considered, the final sample density of SP-5 was one sample per 240 cubic yards. [Source: *Project Specific Plan for Sampling of Soil Pile 5 for WAC Attainment* (22000-PSP-0001) and Variance/Field Change Notice 50.03.52.03-4.]

Because the initial sampling density of SP-1, SP-2, and SP-4 (based on only random samples) is comparable to the final sampling density of SP-5, and because biased samples identified during field activities will increase the sampling density (10 percent increase per additional sample), no additional random sample locations are proposed.

Action: No action.

Commenting Organization: Ohio EPA

Section #: 1.2.1.1

Pg #: 1-2

Line #: 6-9

2200
Commentor: OFFO
Code: C

Original Comment #: 2

Comment: The text states that SP-1 is divided into two distinct areas, but does not explain how. It is also stated that the western portion of this pile will remain open to accept soil, but does not provide a plan as to how the pile will be managed to prevent compromising the sampled eastern portion. Please provide clarification.

Response: Because the eastern portion of SP-1 is a radiological contamination area and the western portion is only a radiological controlled area, the eastern portion is separated by construction fence and radiological control rope with signs stating that entry is only allowed under an approved Radiological Work Permit (RWP). In addition, the entire stockpile is surrounded by a locked chain-link fence.

The eastern portion of the stockpile was seeded on April 20, 1999. If any erosion that crosses the east/west boundary is noted during the weekly stockpile inspections, a work order will be put in place to correct the identified problem(s). These inspections, combined with the fact that the western portion has a good vegetative cover on it already, will minimize cross-contamination between the two sides of the pile.

Any future addition of soil or debris to SP-1 will be coordinated through the Waste Acceptance Organization who will direct that the soil/debris be placed at the western edge of SP-1.

Action: The separation and control of the eastern and western portions of SP-1 will be clarified in Section 1.2.1.1 of the PSP.

Commenting Organization: Ohio EPA

Section #: 1.2.1.2.1

Pg #: 1-2

Line #: 34

Commentor: OFFO
Code: C

Original Comment #: 3

Comment: In general, Ohio EPA would prefer a more specific description of existing data. Statements such as "All TCLP results were either non-detects or were below the TCLP regulatory limit ..." are not precise enough because the reader will inevitably ask the question "How far are the results below the regulatory limit and what are the chances that there are soils above the regulatory limit present." In the present case, however, the Plan as written is precise enough because data is available from only the Maintenance Building Warehouse construction.

Response: Agreed. In the future, data that is referenced in the text will be provided in an appendix to the PSP. An appendix will be added to this PSP which presents the data discussed in the text.

Action: The attached appendix will be added to the PSP.